

## Appointment

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**From:** Beeler, Cindy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9B11E688258C462BAB293A6DF8FF4B27-BEELER, CYNTHIA]  
**Sent:** 6/21/2019 3:00:42 PM  
**To:** Thomas, Deb [thomas.debrah@epa.gov]  
**CC:** Patefield, Scott [Patefield.Scott@epa.gov]; Morales, Monica [Morales.Monica@epa.gov]  
**Subject:** Options Selection for Oil and Natural Gas NSPS Technical Reconsideration (Tier 2, SAN 5719.8)  
**Attachments:** NSPS OOOOa Pre-OSTechnical6.19.19.docx  
**Location:** WJC - N 5400 + Video with RTP + **Ex. 6 Personal Privacy (PP)**  
**Start:** 6/24/2019 3:45:00 PM  
**End:** 6/24/2019 4:45:00 PM  
**Show Time As:** Tentative

Deb –

This meeting has moved around quite a bit – I think this date (Fri, 6/21 at 8am MT) is the current scheduled time for Options Selection briefing with Wehrum on the “technical package” portion of NSPS OOOOa revisions. I have Friday, 6/21 off but can sit in on the call from home.

OAQPS is still working on management review of the materials for Options Selection but is sharing the attached **draft** that their management is reviewing. OAQPS is still reviewing the information in the materials and this will likely be updated before Friday.

Let me know if you have any specific questions.

\*\*\*\*\* Further Background \*\*\*\*\*

Deb –

The national workgroup has not received a copy of the briefing document that is to be used for Options Selection with Bill Wehrum. I will forward it to you once I receive it. I have Friday, 6/21 off but can sit in on the call from home.

FYI, here is the status of the revisions to NSPS OOOOa:

### REGULATORY REVISIONS TO NSPS OOOOA Status 6/10/19

The regulatory revisions to 2016 NSPS OOOOa are occurring in two packages:

## Ex. 5 Deliberative Process (DP)

### Status & Next Steps of Technical Package

- Option Selection on Final rule – scheduled for Fri, 6/14/19.
- R8 sent in FAR for the proposed rule as ‘concur-with-comments’ on 4/18/18.

- Proposed rule published 10/15/18. Public comments closed 12/17/18.

## Ex. 5 Deliberative Process (DP)

- OAQPS is currently preparing Options Selection briefing material for Division Director and ultimately for Wehrum for the final rule. Current schedule:
  - FAR - June/July 2019
  - OMB Review – July 2019
  - Final Package for signature – August 30, 2019
- R8 has agreed to the following requested expediting and waivers of the ADP process during this rulemaking:
  - Down-tier SAN 5719.8 from Tier 1 to Tier 2 (R8 sent 12/11/17 recommending Tier2 rather than down to Tier 3 – this will now be a Tier 2)
  - Waive Analytic Blue Print on SAN 5719.8 (R8 sent 1/4/18)
  - Waive Early Guidance on SAN 5719.8 (R8 sent 1/24/18)
  - Expedite FAR on proposed SAN 5719.8 (R8 sent 2/7/18)
  - Waive Analytic Blueprint as the technical package goes final (R8 sent 5/13/19)

### Status & Next Steps of Policy Package

## Ex. 5 Deliberative Process (DP)

- On 5/30/19 OAQPS began routing the proposed rule through OAR – then to OP (typically ~2 weeks) – then to OMB.
- R8 has agreed to the following requested expediting and waivers of the ADP process during this rulemaking:
  - Waive Analytic Blue Print on SAN 6616 (R8 sent 1/29/18)
  - Expedite FAR on proposed SAN 6616 (R8 sent 5/7/18)

### Other

- CTGs (Control Techniques Guidelines)

## Ex. 5 Deliberative Process (DP)

- The comment period on the proposed CTG withdrawal closed 4/23/18 - EPA received over 90,000 comments.

- The CTG supplemental proposal will follow the NSPS OOOOa SAN 6616 policy proposal to OMB (~Aug-Sep 2019).
- The CTGs are a separate rulemaking from NSPS OOOOa and it does not have an inter-office technical workgroup.